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**APPLICATION DENIED:**

  
HON. J. PAUL OETKEN  
UNITED STATES DISTRICT JUDGE  
10/9/12

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October 9, 2012

VIA FAX

Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: United States v. Zemlyansky, et al., 12-CR-00171 (JPO)

Dear Judge Oetken:

We are the attorneys for Michael Morgan, a defendant in the above-referenced matter. We write to request modification of Dr. Morgan's pretrial travel restrictions. Dr. Morgan requests permission to travel to Giza, Egypt from October 12, 2012 through October 17, 2012. The purpose of the trip would be to visit his dying uncle, Father Matta Morgan, who is a priest and has been hospitalized after having recently suffered a stroke. It has been reported to us that Father Morgan is in grave condition and this would likely be the last opportunity for Dr. Morgan to see his uncle alive. Dr. Morgan would be staying with family at 7 el Atiba Street, # 3A, Mohandessein, Giza, Egypt and would be visiting his uncle at the Hayat Hospital, located at 6 Menis St., El Korba Heliopolis, Egypt. We also request that the Court authorize the temporary release of Dr. Morgan's passport from Pre-Trial Services, to be returned upon completion of the trip. A travel itinerary and contact information would be provided to Pre-Trial Services and the government.

We have communicated with Assistant United States Attorney Daniel Goldman, who advises that the government opposes this request. We have also communicated with Pretrial

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Services Officer Jeffrey Steimel, who advises that Pre-Trial Services takes no position on this request.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Stabile', with a stylized flourish at the end.

Renato C. Stabile

cc: AUSA Daniel Goldman  
Jeffrey Steimel, Pretrial Services  
(both via email)